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April 11, 1996

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Mr. William F. Caton, Acting Secretary Federal Communications Commission 1919 M Street, NW, Room 222 Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Before the Federal Communications Commission Washington, DC 20554

In the Matter of Federal-State Joint Board on Universal Service

cc Docket No. 96-45

COMMENTS OF ROBERT A. HART IV

A social contract relating to telecommunications has existed in the USA for many years. This social contract is called the Universal Service Fund (USF). Please realize that the USF includes historical division of revenue processes and philosophies among existing local exchange carriers, coupled with their carrier-of-last-resort obligation. This fund may eventually need to be "unbundled" as a result of the decision to embrace competition within the local exchange.

The FCC must make informed judgments relative to targeting "unbundling" USF elements in a manner consistent with basic characteristics of a given technology. In other words, leadership by the FCC is important to encourage the proper technologies to be widely deployed which most appropriately meet the fundamental applications associated with the technology. Without this leadership, global and holistic view, improper technologies could theoretically be deployed penalizing the evolution of information age infrastructure in our country.

Please do not allow our country to become a society of information "have and have nots". We are confident that you are aware of this debate, its implication relative to the roots of democracy, and will implement the proper framework.

Keep in mind that technology is leading toward a more distributed environment rather than a centralized environment. Please keep the independent telephone

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Mr. William F. Caton, Acting Secretary Federal Communications Commission April 11, 1996 Page 2

companies in the country in mind throughout the decision process. They are not economies of scale, they are economies of specialization. They have served our country well; including the RUS telephone loan program, a government agency that has worked for over forty years.

We are reminded of political leadership stating "get the government out of the banking business" and the associated "savings and loan bailout". Please relate this past situation to the RUS telephone loan program.

In summary, we believe the consequences of pending decisions are enormous. "Unbundled" USF elements and changes in carrier interconnection philosophies should encourage deployment of technologies of best fit, with associated flexibility regarding provision of affordable future communication services. Once a "level playing field" can be declared in the local exchange, future technological enhancements will theoretically be driven by market forces relative to the future services demanded by the public. We believe there should always be a "floor" of universally affordable services available to the public regardless of geography. We believe that this "floor" should be at least Basic Rate Access Integrated Services Digital Network, or equivalent. In addition, we believe that the "floor" should evolve upward over time in quality and switched information rate capacities.

Respectfully,

Robert A. Hart IV

F - 1/15

RAH: AE Encls.

CERTIFICATE OF SERVICE

I, Ann Eichelberger, hereby certify that a copy of the foregoing Comments of Robert A. Hart IV in cc Docket No. 96-45 was served on this 11th day of April 1996, by first class, U.S. mail, postage prepaid, to the parties on the attached pages.

Ann Eichelberger

Attachment: Service List

Page 1 of 5

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